

EXHIBIT L

COPY

Jean Williams
August 04, 2017

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

No.: 3:16CV0179-MGM

JEAN WILLIAMS, on behalf of
herself and all similarly
situated individuals

PLAINTIFF

vs.

CITY OF SPRINGFIELD DEPARTMENT
OF PUBLIC WORKS
DEFENDANT

DEPOSITION OF: JEAN WILLIAMS

Taken before Roxanne C. Costigan,
Certified Merit Reporter, Notary Public, pursuant to
Rule 30 of the Federal Rules of Civil Procedure, at
the law offices of SPRINGFIELD LAW DEPARTMENT, 36
Court Street, Springfield, MA, on August 4, 2017.

Roxanne C. Costigan
Certified Merit Reporter

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CITY OF SPRINGFIELD
Law Department

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<p style="text-align: right;">Page 130</p> <p>1 them. Four by four. Four by four.</p> <p>2 Q. It's a four by four truck with a plow in</p> <p>3 the front?</p> <p>4 A. Yes.</p> <p>5 Q. Was George operating the truck?</p> <p>6 A. Yes.</p> <p>7 Q. Had you ever operated a truck like that</p> <p>8 prior to this?</p> <p>9 A. Had I?</p> <p>10 Q. Yes.</p> <p>11 A. Or him?</p> <p>12 Q. Had you?</p> <p>13 A. No.</p> <p>14 Q. Do you have any kind of special license</p> <p>15 other than a regular driver's license?</p> <p>16 A. No. I was told I didn't need one.</p> <p>17 Q. So, George operated the truck the whole</p> <p>18 shift from eleven p.m. to one p.m. or did he have you</p> <p>19 operate it at any point?</p> <p>20 A. I'm not sure. I did drive. I'm not sure</p> <p>21 if -- I'm not sure if I did that time, but I did drive</p> <p>22 the truck.</p> <p>23 Q. What did George tell you as you were</p> <p>24 driving around on the first time you went out with</p>	<p style="text-align: right;">Page 132</p> <p>1 they did. So, if it wasn't wide enough, we would have</p> <p>2 to call it in to the Tapley Street.</p> <p>3 Q. Anything else that you were supposed to</p> <p>4 inspect besides how wide it was?</p> <p>5 A. No, not that I can recall.</p> <p>6 Q. Did he give you any other instruction on</p> <p>7 the snowplowing?</p> <p>8 A. Not that I can recall.</p> <p>9 Q. Did he tell you -- or strike that.</p> <p>10 Did you deal with any snowplow operators</p> <p>11 during that eleven a.m. -- eleven p.m. to one p.m.</p> <p>12 shift?</p> <p>13 A. I was introduced to them.</p> <p>14 Q. But did you have any interactions with</p> <p>15 them other than being introduced with them?</p> <p>16 A. We had to fill out slips of their time</p> <p>17 and we filled out their slips, their beginning time</p> <p>18 and their end time, and pass the slip. Have a good</p> <p>19 day, good night, whatever.</p> <p>20 Q. Did you see any snowplow operators not</p> <p>21 doing their job?</p> <p>22 A. No.</p> <p>23 Q. Did you or George have any interaction</p> <p>24 with any citizens that night from eleven p.m. to one</p>
<p style="text-align: right;">Page 131</p> <p>1 him?</p> <p>2 A. As far as what?</p> <p>3 Q. As far as what the job is, I mean, what</p> <p>4 was he doing? Let me --</p> <p>5 A. He was driving --</p> <p>6 Q. Was George training you, George Larue?</p> <p>7 Was that the point of you going out with him?</p> <p>8 A. Yes.</p> <p>9 Q. Other than being trained with George, had</p> <p>10 you received any other training in regard to this</p> <p>11 position? Did you go to any kind of classes? Did you</p> <p>12 get a webinar? Did you get any other training?</p> <p>13 A. No.</p> <p>14 Q. So, what training did George offer you?</p> <p>15 What did he say to you on this shift when you went out</p> <p>16 with him the first time?</p> <p>17 A. That I have to watch the -- we weren't --</p> <p>18 we weren't plowing. We were observing or watching</p> <p>19 what the snowplow drivers did. That was our job. We</p> <p>20 were inspecting what the snowplow drivers did. So, he</p> <p>21 was telling me the widening of the streets, if the</p> <p>22 streets weren't cleared, we would have to call it in</p> <p>23 to DFW and have them go back out, the snowplow</p> <p>24 drivers. We were the inspectors. We inspected what</p>	<p style="text-align: right;">Page 133</p> <p>1 p.m., night and day?</p> <p>2 A. Not that I can recall.</p> <p>3 Q. Did George talk to you about how you</p> <p>4 interact with citizens if they have complaints about</p> <p>5 snowplowing?</p> <p>6 A. Oh, just be polite. You know, if there</p> <p>7 was a beef, we just call the police, but I don't think</p> <p>8 we -- as far as I can recall, we don't -- we didn't</p> <p>9 have any beefs.</p> <p>10 Q. Was there any talk between you and George</p> <p>11 about where the snow was actually supposed to be</p> <p>12 plowed on the street, in other words, if you're taking</p> <p>13 a corner, or you're at a dead end, et cetera?</p> <p>14 A. Push it up to the curb.</p> <p>15 Q. Did George give you any other instruction</p> <p>16 or any other understanding of how this job was to be</p> <p>17 performed during that training session from eleven</p> <p>18 p.m. to one p.m.?</p> <p>19 A. Not that I can recall.</p> <p>20 Q. Did you have any questions for George?</p> <p>21 A. I asked as we went along. I don't recall</p> <p>22 nothing was written.</p> <p>23 Q. What area of the city were you in with</p> <p>24 George?</p>

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<p>1 A. Forest Park.</p> <p>2 Q. The entire time?</p> <p>3 A. Unless we went back to get gas.</p> <p>4 Q. When you say Forest Park, which part of</p> <p>5 Forest Park?</p> <p>6 A. East Forest Park.</p> <p>7 Q. The whole area?</p> <p>8 A. I believe so, yeah.</p> <p>9 Q. Did George go down every street in East</p> <p>10 Forest Park?</p> <p>11 A. Yes.</p> <p>12 Q. What did he tell you he was looking for</p> <p>13 when he went down the streets?</p> <p>14 A. If the snow was -- if the streets were</p> <p>15 wide enough.</p> <p>16 Q. Just wide enough, and that was the only</p> <p>17 thing?</p> <p>18 A. If they were widened and did they push</p> <p>19 the snow back far enough. If it was like at a corner,</p> <p>20 they had to make sure that the snow was packed up,</p> <p>21 don't block the sidewalks.</p> <p>22 Q. Was there any talk about what order the</p> <p>23 streets should be plowed in?</p> <p>24 A. I don't remember. There was an order,</p>	<p>1 for 2013 --</p> <p>2 A. That, I don't know --</p> <p>3 Q. -- snow season?</p> <p>4 A. -- either.</p> <p>5 Q. Do you know any women who applied in the</p> <p>6 2012 through 20 -- strike that -- through the</p> <p>7 2012/2013 snow season who didn't get the job?</p> <p>8 A. I was told, but I don't know.</p> <p>9 Q. What were you told for the 2012/2013</p> <p>10 season, the individuals who applied to be a Snow Route</p> <p>11 Inspector and did not get the position?</p> <p>12 A. I'm not sure, but they told me Deborah</p> <p>13 Abdoo and Maggie Rodriguez.</p> <p>14 Q. Who told you that?</p> <p>15 A. They did.</p> <p>16 Q. When did Deborah Abdoo tell you that?</p> <p>17 A. I don't remember.</p> <p>18 Q. Who was present when she said that?</p> <p>19 A. I don't remember. I didn't, you know,</p> <p>20 keep records of all this.</p> <p>21 Q. Did you keep any notes at all about this</p> <p>22 Snow Route Inspector position or your belief that you</p> <p>23 were discriminated against as a woman or --</p> <p>24 A. When I realized, when I felt that I was,</p>
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<p>1 but I don't remember.</p> <p>2 Q. Did you go out again during the 2013 --</p> <p>3 A. Yes.</p> <p>4 Q. -- snowstorm season? How many times?</p> <p>5 A. Oh, I don't remember.</p> <p>6 Q. How many women were on -- strike that.</p> <p>7 On this Snow Inspector -- Snow Route</p> <p>8 Inspector list, what was your understanding of who had</p> <p>9 that list?</p> <p>10 MR. MONTAGNA: Objection to form.</p> <p>11 Q. (By Ms. Sheehan) Who was in charge of</p> <p>12 the list?</p> <p>13 THE WITNESS: I'm sorry?</p> <p>14 MR. MONTAGNA: Objection to form.</p> <p>15 You can answer.</p> <p>16 THE WITNESS: What's his name?</p> <p>17 Q. (By Ms. Sheehan) If I suggested it was</p> <p>18 Vinnie DeSantis, does that ring a bell for you?</p> <p>19 A. That's it.</p> <p>20 Q. Was every person who applied in the 2013</p> <p>21 snow season put on the Snow Route Inspector list?</p> <p>22 A. Oh, I don't know.</p> <p>23 Q. Do you know any people who applied as a</p> <p>24 Snow Route Inspector and they weren't put on the list</p>	<p>1 then I started keeping notes.</p> <p>2 Q. Where did you keep those notes?</p> <p>3 A. I gave them to my lawyer.</p> <p>4 Q. When did you start writing those notes?</p> <p>5 A. That summer, that summer when I decided</p> <p>6 to file, the MCAD.</p> <p>7 Q. Was that before you had seen your lawyer?</p> <p>8 A. To be honest, I really don't think I</p> <p>9 wrote any specific notes, like, Did Debbie apply? I</p> <p>10 didn't write that down. Or Did this person apply? I</p> <p>11 didn't write that down. Everything that I have, I</p> <p>12 gave to my lawyer.</p> <p>13 Q. When did you start writing those notes?</p> <p>14 A. Any notes that I have --</p> <p>15 Q. Was it before you saw your lawyer?</p> <p>16 A. I don't recall.</p> <p>17 MS. SHEEHAN: Off the record.</p> <p>18 (Off record conference)</p> <p>19 MS. SHEEHAN: On the record. I'm</p> <p>20 going to put on the record, I think it's pretty</p> <p>21 clear that she testified she kept notes and</p> <p>22 that she provided those notes to her lawyer and</p> <p>23 that she kept those notes prior to deciding to</p> <p>24 file the case -- she started writing those</p>